

**REMARKS**

Claims 1-28 have been examined and are all the claims pending in the present application.

Applicants thank the Examiner for the courtesy extended during the telephonic interview of December 11, 2008, during which claim 19 was discussed in view of the rejection under 35 U.S.C. § 101 and claims 1-9, 18-21 and 25-27 were discussed in view of the objections to the specification. Applicants set forth below arguments in response to the Examiner's position, which were similarly discussed in the interview. The Examiner agreed that the subsequently presented remarks are sufficient for overcoming the rejection and the objections discussed in the interview.

**I. Claim Rejections - 35 U.S.C. § 101**

Claim 19 stands rejected under 35 U.S.C. § 101 because the claimed invention is directed to non-statutory subject matter. The Examiner asserts that a "computer-readable medium" could be interpreted as propagation signals. However, the specification clearly correlates a "computer-readable medium" to be something that is not propagation signals.

For example, Figure 3 illustrates a picture text storage unit 101, a scroll speed calculation unit 102, a text display setting information memory 103, and a picture text control unit 104. A person of ordinary skill in the art would readily understand that these "computer" elements would have some kind of physical storage medium. A memory, as illustrated, within a device would clearly be understood by one skilled in the art to be a physical storage medium. Also, it would be at least inherent that the control unit 104 is operable via a physical storage medium

(e.g., a computer-readable medium) and that the scroll speed calculation unit would have at least a processor memory for performing scroll speed calculations.

Also, Figure 8 and the third full paragraph on page 22 of the specification discloses a program memory 407 which stores necessary programs (e.g., a picture text control program 408 and a scroll speed calculation program 409). Also, a microprocessor 410 executes these programs.

In view of the above, it is clear from the specification that a “computer-readable memory” is a physical storage medium, such as, a magnetic media such as hard disks, floppy disks, and magnetic tape; optical media such as CD ROM disks and DVD; magneto-optical media such as optical disks; and hardware devices that are specially configured to store and perform program instructions, such as read-only memory (ROM), random access memory (RAM), flash memory, and the like. A computer-readable medium, however, does not include propagation signals.

Therefore, Applicants respectfully request the Examiner to withdraw the rejection based on at least the foregoing reasons.

## **II. Objections to the Specification**

The specification is objected to as failing to provide proper antecedent basis for a “computer-readable medium.” Applicants traverse the objections based on similar reasons presented above in conjunction with the rejection under 35 U.S.C. § 101. That is, a person of ordinary skill in the art would readily understand that various memory units and computer units disclosed within the specification pertain to physical storage mediums (i.e., computer-readable

mediums). Thus, the specification does provide sufficient antecedent basis for a computer-readable medium.

### III. Claim Rejections - 35 U.S.C. § 102

#### In view of Fujimura

Claims 1, 10, 20-21 and 25-27 are rejected under 35 U.S.C. § 102(e) as allegedly being anticipated by Fujimura et al. (US 6,778,756). Applicants traverse the rejection based on the following comments.

#### A. Claim 1

Claim 1 recites:

A scroll display control device including a computer readable medium which stores a program for causing a computer to execute **scroll-displaying, in synchronism** with reproduction of series information correlated to text information, the corresponding text information on a text display screen, said scroll display control device comprising:

means which **changes a scroll speed in said text display screen on the basis of a text quantity of said corresponding text information with respect to reproduction time of said series information,**

wherein the display area of said text is fixed at a predetermined reference position of the text display screen. (emphasis added).

The Examiner asserts that Fujimura discloses each and every feature of claim 1. In particular, the Examiner asserts that column 13, lines 30-58, of Fujimura discloses that the scrolling speed is determined according to the number of characters/text quantity and the countdown for recording of narration on video, which corresponds to reproduction time of video/series information. Applicants respectfully disagree with the Examiner's position.

Speed is the rate of motion, or equivalently the rate of change in position, often expressed as distance  $d$  traveled per unit of time  $t$ . With regard to the a scrolling speed, the speed may be

regarded as a number of characters per second, as disclosed by Fujimura. The Examiner appears to assert that a “number of characters per second” is a text quantity of the text information.

However, a number of characters per second does not refer to a text quantity or an amount of text of the text information, but instead, Fujimura discloses that the scroll speed once set is fixed to a number of characters displayed per second (col. 13, lines 30-48). The scrolling speed (i.e., the number of characters per second) of Fujimura cannot adapt (i.e., change) according to a text quantity with respect to a reproduction time of the series information. For example, setting a scroll speed to be a 100 characters per second will remain at 100 characters per second regardless of whether the text information has 1,000 characters or 10,000 characters (i.e., regardless of the text quantity of the text information).

Furthermore, Fujimura does not disclose that the scroll speed is changed based on the text quantity with respect to the reproduction time of the series information. Fujimura merely discloses that the scroll speed (i.e., number of characters per second) is set either in advance or manually by the narrator. However, this does not suggest that the scroll speed is changed based on a correlation between the text quantity of the text information and the reproduction time of the series information. The fact that the scroll speed may be changed manually, without consideration of the reproduction time of the series information (col. 13, lines 38-41), suggests that scroll speed is not changed based on the text quantity with respect to the reproduction time. The scroll speed is set independently of any text quantity and the reproduction time, but merely appears to depend on user preference such as the narrator’s comfort reading level.

The Examiner also appears to assert column 13, lines 30-48 of Fujimura discloses that a countdown for recording of narration on video corresponds to the reproduction time of video/series information. Column 13, lines 41-42, of Fujimura merely discloses that alternatively (i.e., another embodiment) to a narrator setting a scroll speed, the scrolling speed may be determined by “inverse counting from the narration end time.” However, Fujimura does not specify what is being inverse counted. It appears a scroll speed may simply be determined by counting the time back from a narration end time to a narration start point, which is known by the narrator (col. 13, lines 41-45). However, Fujimura fails to disclose or fairly suggest that a scroll speed is changed based on a text quantity of the text information with respect to the reproduction time. Fujimura is completely silent on a text quantity and simply does not disclose a text quantity being a factor of the scroll speed with respect to the reproduction time. The Examiner appears to be making conclusions based on the disclosure of the present Application instead of relying on what is taught or suggested in the cited art. That is, Applicants note that impermissible hindsight must be avoided and the legal conclusion must be reached on the basis of the facts gleaned from the prior art.

Furthermore, Fujimura fails to disclose that the display area of said text is fixed at a predetermined reference position of the text display screen, as recited in claim 1.

In view of the above, Applicants submit that claim 1 is patentable for at least the above reasons.

**B. Claim 10**

Claim 10 recites:

A scroll display control method comprising:  
displaying text information corresponding to sound in a scroll manner,  
such that the text information is displayed in synchronism with reproduction of  
the sound by changing a scroll speed adaptable to the sound during  
reproduction,  
wherein the display area of said text information is fixed at a  
predetermined reference position of a text display screen. (emphasis added).

The Examiner asserts that Fujimura discloses that countdown audio is synchronized with a text video such that the text video is displayed in synchronism with the countdown audio by means of the narrator's control over the scrolling speed. However, the countdown audio is merely a warning system which notifies the narrator of a when to start narrating, or more specifically, the countdown audio is a countdown to the narration recording start point (col. 1, lines 17-67). Thus, the countdown audio is merely a clock which counts down for a narrator to notify the narrator to start narrating from text video. Therefore, the countdown audio is produced before narration and thus before any text is scrolled on a display (i.e., text would not be scrolled before the narrator has the opportunity to read therefrom). Therefore, the countdown audio does not play in sync with text information which plays only after the countdown is complete. Furthermore, column 13, lines 30-57, of Fujimura does not disclose that a scroll speed of text is changed such that the text is scrolling in synchronism with a reproduction of sound during the reproduction of the sound.

Furthermore, Fujimura fails to disclose that the display area of said text is fixed at a predetermined reference position of the text display screen, as recited in claim 10.

In view of the above, Applicants submit that claim 10 is patentable for at least these reasons.

**C. Claim 20**

Claim 20 recites that “a reproduction time is a time length of said series information.” The Examiner asserts that column 5, lines 34-46, of Fujimura discloses a time length of video. However, column 5, lines 34-46, of Fujimura merely discloses time information indicates a progress time of video (e.g., 1 hour, 23 minutes, 45 seconds, 6 frames), which merely marks a specific time position of a clock related to the video. This “progress time” is not a time length of the series information (i.e., the length of time of the series information). Furthermore, this portion of Fujimura does not have any correlation to changing the scroll speed, and more particularly, to a text quantity such that the scroll speed may be changed on a basis thereof. Applicants remind the Examiner that features of the claimed invention must be disclosed by the reference in its entirety, and not be merely citing elements in piecemeal which have no apparent relationship with each other. Applicants note that impermissible hindsight must be avoided and the legal conclusion must be reached on the basis of the facts gleaned from the prior art.

Thus, Applicants submit that claim 20 is patentable for at least these reasons.

**D. Claim 21**

Claim 21 recites that the “scroll speed is increased if the text quantity increases with respect to said reproduction time and said scroll speed is decreased if the text quantity decreases with respect to said reproduction time.” The Examiner asserts that column 13, lines 30-40, of Fujimura discloses changing a scroll speed in the unique manner claimed. Fujimura merely

discloses changing a scroll speed manually by setting the scroll speed to be a number of characters per second (col. 13, lines 30-40). A number of characters displayed per second is not an amount of text of the text information. Simply because a speed may be set to 100 characters per second does not equate to a number of characters in the actual text information itself.

Fujimura clearly does not take into account the amount of text in the text information. For example, if the reproduction time remains constant but the text quantity is increased, then the scroll speed is increased. Thus, the scroll speed is increased if the text quantity increases with respect to said reproduction time. Fujimura does not disclose the features of claim 21.

Therefore, claim 21 is patentable for at least this reason.

**E. Claims 25 and 26**

Applicants submit that claims 25 and 26 are patentable at least by virtue of their dependency upon claim 1.

**F. Claim 27**

Claim 27 recites that “the text quantity of said corresponding text information is a total number of characters included within said corresponding text information.” The Examiner asserts that column 13, lines 30-40, of Fujimura discloses a total number of characters included within the text information. However, Fujimura merely discloses that a scroll speed may be decided in advance, like a predetermined number of characters per second (col. 13, lines 30-40). A number of characters displayed per second (i.e., a rate of scrolling) has no relationship with the actual total number of characters included within the text information. For example, setting a scroll speed to be a 100 characters per second will remain at 100 characters per second regardless



of whether the text information has 1,000 characters or 10,000 characters (i.e., regardless of the text quantity of the text information). Fujimura does not disclose a text quantity as claimed. More particularly, Fujimura does not disclose adjusting the scroll speed on the basis of a text quantity of said corresponding text information with respect to reproduction time of said series information, as recited in claim 1.

Thus, Applicants submit that claim 27 is patentable for at least these reasons.

In view of Ahmad

Claims 11-17 and 22-24 stand rejected as allegedly being anticipated by Ahmad et al. (US Pub. No. 2007/0204319). Applicants traverse the rejection based on the following comments.

**A. Claim 11**

Claim 11 recites:

displaying and reading text information corresponding to a picture in synchronism with reproduction of the picture in a scrolling manner, and performing scroll display of said text information in synchronism with the reproduction of the picture by changing a scroll speed adaptable to the picture under reproduction.

wherein the display area of said text information is fixed at a predetermined reference position of a text display screen. (emphasis added)

Ahmad discloses displaying primary information (e.g., video data) on a display device 102 and displaying secondary information (e.g., text data) related to the primary information on a control device 101 (paragraphs 33 and 39). Ahmad also discloses that a user can manually control the primary information using a GUI 200, such as using a speed control 217 to increase or decrease the apparent display rate with which primary information is displayed (paragraphs 49

and 53). Although Ahmad disclose that as the segment of the primary information being displayed changes, the secondary information displays 204a, 204b change as well (paragraph 69), Ahmad fails to disclose that the change to the secondary information displays occurs by performing a scroll of the text information in the displays and that the scroll speed is adaptable to the picture under reproduction.

Also, although Ahmad discloses that a user can cause various parts of the secondary information displays 204a, 204b to be displayed, e.g., the user can be enabled to scroll up and down through a set of text (paragraph 69), Ahmad fails to disclose that the manual use of a scroll up/down function by a user is at a scroll speed which is adaptable to the picture under reproduction **and** is in synchronism with the reproduction of the picture. The ability to manually “scroll though” a set of text does not disclose a “scroll speed.” The user may scroll and stop repetitively by clicking a mouse (see paragraph 69). However, random click of a mouse by a user does not suggest a scroll speed. That is, it appears the user control can be by user preference, and thus, not related to a scroll speed which is in synchronism with the reproduction of the picture. There is no guarantee that synchronism will be maintained. For example, it appears unlikely that a user can manually match the reproduction of video to maintain synchronization. Nor is this feature inherent from the disclosure of Ahmad. “Inherent anticipation requires that the missing descriptive material is ‘**necessarily present,**’ not merely **probably or possibly present**, in the prior art.” (emphasis added) *Trintec Indus., Inc. v. Top-U.S.A. Corp.*, 295 F.3d 1292, 1295, 63 U.S.P.Q.2d 1597, 1599 (Fed. Cir. 2002); see also MPEP §2112.

The Examiner appears to be making conclusions based on the disclosure of the present Application instead of relying on what is taught or suggested in the cited art. That is, Applicants note that impermissible hindsight must be avoided and the legal conclusion must be reached on the basis of the facts gleaned from the prior art. Furthermore, two embodiments in a single reference may not be combined absent specific teaching. *In re Kramer*, 18 USPQ2d 1415, 1416 (Fed. Cir. 1991); *Ex parte Beuther*, 71 USPQ2d 1313, 1316 (BPAI 2003). There is no teaching in the reference to support the Examiner's position.

Furthermore, Ahmad fails to disclose that the display area of said text is fixed at a predetermined reference position of the text display screen, as recited in claim 11.

Therefore, Applicants submit that claim 11 is patentable for at least these reasons.

**B. Claim 13**

Claim 13 recites:

wherein when a text section corresponding to a picture reproduction position is changed, said **scroll speed is derived on the basis of a time length of a picture section** corresponding to the picture reproduction position **and a text quantity of the text section** corresponding to the picture reproduction position.

Paragraph 69 of Ahmad merely discloses that a user may manually scroll through a set of text by mouse pointing and clicking. That is, *assuming arguendo* that Ahmad discloses a "scroll speed", Ahmad does not disclose that the user has the ability to **derive** a scroll speed based on the time length of the picture section and the text quantity (i.e., amount of text) of the text section which corresponds to the picture reproduction position. Also, merely saying that secondary information displays 204a, 204b changes as the primary information changes is not enough to suggest the unique features of the present invention which require that the scroll speed be

derived on the basis of a time length of a picture section corresponding to the picture reproduction position and a text quantity of the text section corresponding to the picture reproduction position.

Again, the Examiner appears to be making conclusions based on the disclosure of the present Application instead of relying on what is taught or suggested in the cited art. That is, Applicants note that impermissible hindsight must be avoided and the legal conclusion must be reached on the basis of the facts gleaned from the prior art. Thus, Applicants submit that claim 13 is patentable for at least these reason.

**C. Claim 14**

Claim 14 recites:

changing a text display setting of the text to be synchronously displayed with reproduction of the picture, and wherein, when the text display setting of the text is changed, said scroll speed is derived on the basis of the changed text display setting of the text.

The Examiner asserts that setting the display rate by means of a speed control teaches the above features of claim 14 (see Ahmad paragraph 53). However, paragraph 53 of Ahmad merely relates to increasing/decreasing the rate with which the primary information (e.g., video data) is displayed, and not to a text display setting (see also paragraph 33). Paragraph 53 does not relate to a text display setting of the text synchronously displayed with reproduction of the picture, such that when the text display setting is changed, the scroll speed is derived on the basis of the changed text display setting of the text. It should also be clear from the claim that a text display setting of the text is a separate and distinct feature from the scroll speed, contrary to what the Examiner appears to suggest.

In addition, Ahmad merely discloses that a scroll is manually performed through the mouse pointing by a user (paragraphs 49 and 53), and does not disclose or fairly suggest that the scroll speed is derived on the basis of the changed text display setting of the text.

Therefore, Applicants submit that claim 14 is patentable for at least these reasons.

**D. Claim 17**

Claim 17 recites:

the text quantity of the text section succeeding the text section corresponding to the picture under reproduction is increased by changing the text display setting when reproduction of the picture is slow reproduction.

However, paragraph 53 of Ahmad merely relates to increasing/decreasing the rate with which the primary information (e.g., video data) is displayed, and not to increasing a text quantity of a text section succeeding the text section corresponding to the picture under reproduction. Ahmad also fails to teach different text sections (e.g., a text section and a succeeding text section). For example, secondary information display 204a or the left portion of 214 merely relate to one story (i.e., a text section corresponding to the picture under reproduction) (paragraph 69). Secondary information display 204b, however, relates to another story and would not be affected by changes to the a video related to secondary information display 204a (paragraph 69). Ahmad does not disclose a text section succeeding the text section corresponding to the picture under reproduction, and also does not disclose increasing the text quantity of the succeeding text section by changing the text display setting when reproduction of the picture is slow reproduction. It should also be clear from the claim that a text display setting

of the text is a separate and distinct feature from the scroll speed, contrary to what the Examiner appears to suggest by referencing paragraph 53 of Ahmad.

Therefore, Applicants submit that claim 17 is patentable for at least these reasons.

**E. Claims 22, 23 and 24**

Claim 22 recites:

the changing of the text display setting includes at least one of changing a display reference position of a target text, changing of a text display area size indicative of a height and a width of a text display area, and changing of a display text character size indicative of a height and a width of a text character.

The Examiner asserts that changing the display rate of video data corresponds to changing a display reference position of the text data. Applicants respectfully disagree. Firstly, changing the rate of display of video is not a change in the reference position of text, even if text is changed as video is changed. The actual text on a display may change, however, nothing in Ahmad suggests that a reference position of the target text is changed. That is, a reference position at which a user views text in regions 214 of Ahmad, for example, remains the same. A user still reads or references text from a same position even if the actual text being read is changed. Thus, Ahmad does not disclose changing a display reference position of the target text. Applicants submit that claims 22, are patentable for at least this reason, and that claims 23 and 24 are patentable for similar reasons.

**F. Claims 12, 15 and 16**

Applicants submit that claims 12, 15 and 16 are patentable at least by virtue of their respective dependencies.

#### **IV. Claim Rejections - 35 U.S.C. § 103**

Claims 2-9, 18, 19 and 28 stand rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Fujimura in view of Randall et al. (US Pub. No. 2003/0090507). Applicants traverse the rejection based on the following comments.

##### **A. Claims 2, 18 and 19**

Randall fails to correct the deficiencies of Fujimura in view of claims 1 and 10. That is, claim 2 recites “scroll speed calculation means which calculates a scroll speed on the basis of at least a time length of a series information section presently under reproduction and a quantity of the text belonging to a text section corresponding to the series information section during reproduction,” which the Examiner asserts is taught by Fujimura for similar reasons which are the basis for the Examiner’s rejections for claim 1 and 10. Thus, Applicants submit that Fujimura, alone or in combination with Randall, fails to teach or suggest the features of claim 2 for reasons similar to those presented above in conjunction with claims 1 and 10. More specifically, the cited art fails to teach or suggest a scroll speed calculation means which calculates a scroll speed on the basis of at least a time length of a series information section presently under reproduction and a quantity of the text belonging to a text section corresponding to the series information section during reproduction.

Furthermore, Fujimura merely discloses that a scrolling speed (e.g., number of characters per second) may be decided in advance, though it may be controlled by a narrator manually (col. 13, lines 37-40). However, the intervening operations performed by a user cannot teach an element of a claimed apparatus. *In re Bell*, 991 F. 2d 781 (Fed. Cir. 1993). Fujimura does not

teach a scroll speed calculation means which calculates the scroll speed according to the unique basis of a text quantity and a time length of series information, during reproduction. Applicants also point out that and setting of the scroll speed “in advance” as disclosed by column 13, lines 37-48, of Fujimura is not a calculation during reproduction. Also, two alternative embodiments in a single reference may not be combined absent specific teaching. In re Kramer, 18 USPQ2d 1415, 1416 (Fed. Cir. 1991); Ex parte Beuther, 71 USPQ2d 1313, 1316 (BPAI 2003). That is, Fujimura, even if Fujimura teaches that a scroll speed is calculated by a “scroll speed calculation means”, it does so only in advance. There is no teaching that any calculations are performed during reproduction of the series information section presently under reproduction.

In addition, there is no teaching in the references for combining the references in a way suggested by the Examiner. For example, Randall appears to teach a reference position as a horizontal line on the display, applicable to text scrolling vertically (see region 40 of Fig. 1). However, Fujimura merely teaches that a text is scrolled on the lower part of the monitor, and the text is scrolled right to left (i.e., horizontally) (col. 13, lines 30-37 and Fig. 9). Thus, there is no teaching in the references as to how a “reference position” in the form of a horizontal line would apply to referencing the text of Fujimura, which is merely represented by a single line of text scrolling horizontally on the display. The reference line of Randall would appear to be a superfluous feature, which would serve no benefit to the scroll device of Fujimura. That is because the reference line of Randall clearly applies only to text being scrolled vertically. Thus, a person of ordinary skill in the art would not look to Randall for correcting the deficiencies of Fujimura.



Applicants submit that claim 2 is patentable for at least these features set forth above.

Claims 18 and 19 are also patentable for similar reasons.

**B. Claims 3, 4, 6 and 8**

The Examiner also asserts that Fujimura teaches the features of claims 3, 4, 6 and 8.

However, claim 3 is also patentable for reasons similar to those presented above in conjunction with claim 1. Also, claims 4, 6 and 8 are patentable at least by virtue of their respective dependencies.

In addition, claim 6 recites “a user instruction input means for dynamically changing the text display setting information.” The Examiner asserts that manually inputting a countdown end time teaches the features of claim 6. A countdown end time is merely a relates to generation of a countdown audio signal, which is generated when time information reaches a time of a predetermined period before the countdown end time (col. 5, lines 48-57). Thus, the countdown end time, which relates to an audio countdown, has nothing to do with a text display setting. Therefore, claim 6 should be patentable for at least this additional reason.

**C. Claims 5, 7 and 9**

Claim 5 is patentable at least by virtue of its dependency on claim 3. That is, Randall fails to correct the deficiencies of Fujimura with respect to claims 2 and 3.

Claim 7 recites that “text of a preceding text section which precedes the text section and text of a succeeding text section which succeeds the text section are respectively displayed in two adjacent areas across the text section displayed at the reference position.” That is, in view of claim 2, a text display screen displays (1) text belonging to the text section corresponding to the

series information section during reproduction (i.e., text section displayed at the reference position), (2) text of a preceding text section which precedes the text section, and (3) text of a succeeding text section which succeeds the text section.

Fujimura fails to teach any text section other than the line of text displayed on the lower portion of the screen (see Fig. 9). Also, Figure 1 of Randall merely illustrates an “action area” 40 which is a predetermined area of the screen where text within is spoken out loud (paragraphs 10 and 27). As seen in Figure 1 of Randall, however, no text is illustrated preceding the “action area” 40 (i.e., above action area 40). Randall at best teaches a text section which succeeds the text section in the action area 40, but not preceding text section is taught or suggested.

Furthermore, a person of ordinary skill in the art would not modify the features of Fujimura with the features of Randall for reasons similar to those presented above in conjunction with claim 2. That is, a narration script displayed on a lower part of a display, being scrolled right to left, as in Fujimura is not able to have multiple text sections. There is no teaching that Fujimura can be modified to have the three text sections as claimed in claim 7

Therefore, claim 7 is patentable for at least these reasons.

Claim 9 is patentable at least by virtue of its dependency on claim 2. That is, Randall fails to correct the deficiencies of Fujimura with respect to claim 2.

#### **D. Claim 28**

Claim 28 recites that “the quantity of the text belonging to the text section corresponding to the series information section is a total number of characters included within the text section.” Applicants submit that claim 28 is patentable for reasons similar to those presented above in

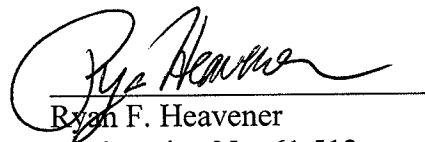
conjunction with claim 27. That is, a number of characters displayed per second (i.e., a rate of scrolling) has no relationship with the actual total number of characters included within the text information. Fujimura fails to teach that the scroll speed is calculated on the basis of a text quantity of said corresponding text information with respect to reproduction time of said series information, as recited in claim 2. Therefore, claim 28 is patentable for at least these reasons.

**V. Conclusion**

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,

  
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